

ORIGINAL

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

UNITED STATES DISTRICT COURT

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

for the

District of Hawaii

APR 05 2021

at 3 o'clock and 15 min. P M
MICHELLE RYNNE, CLERKDawn Palikan
526 Siebert Drive
Schererville, IN 46375

Division

CV21 00171 JAO RT

Case No.

(to be filled in by the Clerk's Office)

Dawn Marie Palikan

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Longs Drugs, CVS Health (DBA) Longs Drugs,
Tammie Sue Shifflett, and Cheryl Lynn Justak

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE
(28 U.S.C. § 1332; Diversity of Citizenship)**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Dawn Marie Palikan
Street Address	526 Siebert Drive
City and County	Schererville, Lake County
State and Zip Code	Indiana 46375
Telephone Number	219-951-6414
E-mail Address	dawn_palikan@outlook.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Longs Drugs
Job or Title <i>(if known)</i>	Pharmacy
Street Address	75-5595 Palani Rd.
City and County	Kailua Kona, Hawaii County
State and Zip Code	Hawaii 96740
Telephone Number	808-329-1632
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 2

Name	CVS Health (DBA) Longs Drugs
Job or Title <i>(if known)</i>	Corporation
Street Address	One CVS Drive
City and County	Woonsocket, Providence County
State and Zip Code	Rhode Island 02895
Telephone Number	401-765-1500
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 3

Name	Tammie Sue Shifflett
Job or Title <i>(if known)</i>	N/A
Street Address	1461 NE 57th Place
City and County	Ft. Lauderdale, Broward County
State and Zip Code	Florida, 33334
Telephone Number	954-816-4845
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 4

Name	Cheryl Justak
Job or Title <i>(if known)</i>	N/A
Street Address	435 Northgate Drive
City and County	Crown Point, Lake County
State and Zip Code	Indiana, 46307
Telephone Number	219-730-9132
E-mail Address <i>(if known)</i>	Unknown

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) Dawn Marie Palikan, is a citizen of the
State of (name) Indiana.

2. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated
under the laws of the State of (name) N/A,
and has its principal place of business in the State of (name)
N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) Tammie Sue Shifflett, is a citizen of
the State of (name) Florida. Or is a citizen of
(foreign nation) N/A.

2. If the defendant is a corporation

The defendant, (name) Longs Drugs, is incorporated under
the laws of the State of (name) Hawaii, and has its
principal place of business in the State of (name) Hawaii.
Or is incorporated under the laws of (foreign nation) N/A,
and has its principal place of business in (name) N/A.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

United States District Court for The District of Hawaii

Addendum Section B. The Defendants Between Pages 3 of 7 and 4 of 7

Dawn Marie Palikan

vs

Longs Drugs, CVS Health (DBA Longs Drugs), Tammie Sue Shifflett, Cheryl Lynn Justak

B. The Defendants (Continued)

3. If the defendant is an individual

The defendant, *(name)* Cheryl Lynn Justak, is a citizen of
the State of *(name)* Indiana. Or is a citizen of
(foreign nation) N/A

4. If the defendant is a corporation

The defendant, *(name)* CVS Health, is incorporated under
The laws of the State of *(name)* Hawaii, and has its
Principal place of business in the State of *(name)* Rhode Island
Or is incorporated under the laws of *(foreign nation)* N/A
And has its principal place of business in *(name)* N/A

We are seeking \$10 billion in punitive damages - Due to the personal injury and assault of the plaintiff resulting from Negligence, Intentional Assault and Battery and the Intentional Infliction of Emotional Distress from a grievous, intentional and premeditated act of violence committed against Dawn Marie Palikan. Furthermore, Ms. Palikan is the innocent victim who suffered severe physical, mental, emotional and financial damage and trauma for ten years all due to: Richard Branson's (a billionaire) who has been invading the victims privacy and stalking the victim for years all for fun and his ego. Branson conspired with a lifelong prostitute (Tammie Shifflett) who has been stalking the victim for over ten years and who brought the abuse into Ms. Palikan's personal life, a rapist/pedophile and fugitive (Greg Alan Saul Sr.) who is now incarcerated and Cheryl Lynn Justak (a jealous sister) all who have been slandering the victim and inciting: harrasment, hatred, abuse and violence against Ms. Palikan online and in her personal life for years. They bullied, stalked and abused Ms. Palikan all for the "FUN OF IT" and to keep her artwork for ten years. This was all done so they could be "SOMEONE."

The victim was even told that Richard Branson killed her brother (Greg Palikan who died in 2017 from a mysterious bacterial infection after suffering years of hardship as well). Branson has had the victim assaulted in airports while on her way to her brother's funeral. He arranged for people to ram the victim over and over in the airport, having the people say "SORRY" all while laughing and mocking her brother's death. He then made a Reese's commercial about the abuse saying he was "Not Sorry" and a "Won't Stop" commercial. Richard Branson has stripped Ms. Palikan of over ten jobs, two cars and over twelve homes. He and the others have arranged mobs of abusers to constantly follow, stalk, harras and abuse Ms. Palikan daily for over ten years. All to verbally abuse, block and humiliate the victim, while wearing sexually abusive and humiliating T-shirts.

Branson has used every company he has against her as a weapon: flying huge aircraft above her head, giving her a false cancer diagnosis, mocking her in movies, music and in books. Ms. Palikan was even told that she has been infected with the HIV virus. She is negative so far. However, Richard Branson, Longs Drugs (CVS Health), Tammie Sue Shifflett and Cheryl Lynn Justak inflicted the most physically damaging, dangerous and traumatic acts of violence in ten years against Ms. Palikan by attempting to blind her. These people, along with Longs Drugs wanted to strip Ms. Palikan of her vision permanently (after stripping her of everything else for ten years) causing her great and unrepairable trauma and damage.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) 04/19/2019 , at (place) Longs Drugs - 75-5595 Palani Rd, Kailua Kona, Hawaii 96740 ,
 the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

Personal Injury Due To: Negligence - Assault and Battery - Intentional Infliction of Emotional Distress.

Longs Drugs intentionally gave the Plaintiff, Dawn Marie Palikan (an innocent woman with an impeccable background who has endured horrible: stalking, abuse, slander, humiliation, isolation, financial, physical, mental and emotional damage and crimes for ten years. They have done this to her (all while blocking her from legal protection, legal assistance and legal representation of any kind) by giving her tainted eye drops to permanently blind Ms. Palikan and to take her eyesight away from her forever.

Ms. Palikan did not receive eye drops that she had a bad reaction to, she was purposely (with intent) given tainted eyes drops to inflict great pain, harm and permanent damage. All of this was done by the request Richard Branson (a billionaire) of the Virgin Conglomerate who has been: slandering, stalking, exploiting, humiliating, abusing, sexually harassing and threatening Dawn Marie Palikan with blindness, paralysis (paralyzing blind people and people in wheelchairs with severed limbs) and even death for years.

Richard Branson, and the others have stripped the victim of every single civil right given to a person in this country. They have kept her from employment, medical care, tax returns, unemployment benefits, housing, food and even medicine. The defendants instructed others to use, abuse and steal from the victim inflicting great damage mentally, emotionally and financially for years. As of November 2020, Ms. Palikan now has permanent nerve damage in her legs. This was all done on behalf of a prostitute (Tammie Sue Shifflett), a rapist, pedophile and fugitive (Greg Alan Saul Sr.) who is now incarcerated, a few bullies, a hacker and a jealous sister (Cheryl Lynn Justak) who stole Ms. Palikan's (three year, \$50,000) Myspace project ten years ago and used it to acquire: fame, famous connections, power and money and to inflict great damage onto Ms. Palikan in order to keep her work.

Three separate parties came into Ms. Palikan's place of employment in Hawaii and told her that Tammie Sue Shifflett (who has been stalking Ms. Palikan since 2009) and her own sister Cheryl Justak (who stole Ms. Palikan's three year, \$50,000 Myspace project) were personally responsible (co-conspirators along with Richard Branson) for burning the victim's eyes. Richard Charles Branson financed this grievous act of hatred and violence against Ms. Palikan. Ms. Palikan is an innocent victim who has never even met Richard Branson.

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

The intentional act of giving Ms. Palikan tainted eye drops that literally battered her and inflicted great damage: physically, mentally, emotionally and financially. Ms. Palikan not only had endured great pain, impaired vision for days, constant watering, redness and swelling from the severe burns (after using the eye drops for only one day) Ms. Palikan suffered severe mental and emotional distress and trauma from this violent act. Ms. Palikan was very concerned for days that she was going to lose her vision permanently and suffer permanent damage. She had to see two doctors for this grievous act of violence. One was a Retinal Surgeon who had to do extensive testing to assess the damage. She was prescribed more eye drops but was too afraid and traumatized to use them. Ms. Palikan now has a fear of picking up and using any medication from any pharmacy for fear of physical harm.

Ms. Palikan not only missed work and was confined to bed rest due to severe pain and vision loss. She then had to wear large, dark sunglasses to hide the severe burns and damage in order to return to work. This act was one of the main and contributing factors that caused Ms. Palikan to leave a job that she loved and was forced to leave her home permanently as well (after living in Hawaii for four years) in fear of her safety. This brutal hate crime contributed to extreme emotional trauma, severe physical damage and great financial hardship and damage as well.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

We are seeking 10 billion in punitive damages seeing this was an intentional act of violence against Ms. Palikan (an innocent person who has done nothing to these people) that inflicted severe pain and permanent trauma and emotional distress all over envy and greed. These people and Longs Drugs also inflicted great physical harm onto her on behalf of a billionaire (who has been abusing Ms. Palikan for ten years now - even threatening to paralyze little girls, her nieces) all for amusement and financial gain. Richard Charles Branson, Tammie Sue Shifflett, Cheryl Lynn Justak and this company aided criminals and rapists, the outlaws, prostitutes and bullies who inflicted ten years of great abuse including: rape, humiliation of epic and global proportions, exploitation, sexual harrassment, death threats, threats to severe limbs and fingers, imprisonment, bullying, stalking and human slavery onto the victim. These vicious bullies and abusers even tried to have Ms. Palikan burned alive and are guilty of conspiracy to commit murder.

Richard Branson told the Plaintiff that she had even been put on television (this was without her knowledge or consent and in the privacy of her own home). Richard Charles Branson baited the victim to join LinkedIn over ten years ago, all to exploit, abuse and humiliate her. In turn, Ms. Palikan has suffered severe physical, mental and emotional trauma along with great financial damage as they literally destroyed her life over and over, inflicting great hardship and stripped her of everything for over ten years. This company (Longs Drugs) and the above mentioned defendant's actions (wanted to strip Ms. Palikan of her vision) were the most damaging and traumatic of them all.

These individuals and this company needs to be made an example of seeing they wanted to blind Ms. Palikan permanently. Dawn Marie Palikan has now endured permanent nerve damage in her legs do to more grievous and violent acts of hatred such as this one that was done to victimize an innocent woman and inflict permanent damage all for fun, popularity, envy and greed. I cannot stress what a grievous act of hatred, brutality and violence this is. They victimized this innocent woman for years. I request that there be a criminal investigation regarding this and all matters listed with arrests being made.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

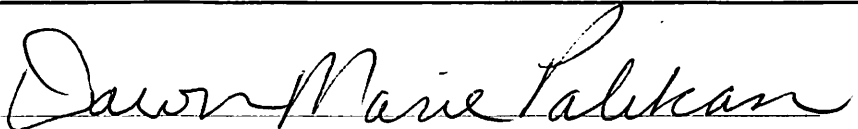
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04/02/2021

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

Signature of Plaintiff

Printed Name of Plaintiff


Dawn Marie Palikan

B. For Attorneys

Date of signing: _____ N/A

Signature of Attorney

N/A

Printed Name of Attorney

N/A

Bar Number

N/A

Name of Law Firm

N/A

Street Address

N/A

State and Zip Code

N/A

Telephone Number

N/A

E-mail Address

N/A